



Application granted. The parties shall submit proposed Jury Instructions in accordance with the Court's Individual Practices by March 31, 2023.

The Clerk of Court is respectfully directed to terminate the motion sequence pending at Doc. 154.

SO ORDERED.

A handwritten signature in black ink, appearing to be 'P. Halpern'.

March

Philip M. Halpern
United States District Judge

Dated: White Plains, New York
March 28, 2023

VIA ECF

The Honorable Philip M. Halpern, U.S.D.J.
U.S. District Court Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Re: Liang v. Master Wok, Inc., et al, 7:20-cv-03904 (PMH)

Dear Judge Halpern:

This firm represents the Defendants. We submit this letter to respectfully request a 4-day extension of the March 27, 2023 deadline to file a proposed jury charge.

As background, the parties' initial deadline to file a proposed jury charge, verdict sheet, and *voir dire* was March 15, 2023. The parties requested an extension of this deadline because Plaintiff sent Defendants their proposed jury charge, verdict sheet, and *voir dire* without sufficient time for Defendants to review and approve them. The Court, pursuant to its March 17, 2023 Order, extended the parties' deadline to file these pleadings to March 27, 2023.

Upon reviewing Plaintiff's 45 page proposed jury charge, Defendants noticed that it did not contain "citation[s] to the source/authority for the proposed instruction," as required under Your Honor's Individual Rule 6(B)(i). Defendants promptly advised Plaintiff of this and requested Plaintiff to revise the proposed jury charge to include the required citations. Despite multiple follow ups on this, it was not until yesterday evening that Plaintiff emailed Defendants the 45 page proposed jury charge with citations. Although the parties filed their proposed verdict sheet and *voir dire* today, Defendants respectfully request more time to review Plaintiff's proposed jury charge and discuss them with Plaintiff.



The Honorable Philip M. Halpern

March 27, 2023

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Based on the foregoing, Defendants respectfully request a 4-day extension, until March 31 to submit the parties' proposed jury charge. Plaintiff consents to this request. We appreciate the Court's consideration of this request.

Respectfully submitted,
LIPSKY LOWE LLP

s/ Douglas B. Lipsky
Douglas B. Lipsky

CC: All counsel of record (Via ECF)